

5 CEQA Required Conclusions

This section presents a summary of the impacts of the proposed General Plan in several subject areas specifically required by CEQA, including growth-inducing impacts, cumulative impacts, significant and unavoidable impacts, significant irreversible environmental changes, and impacts found not to be significant. These findings are based on the analysis provided in Chapter 3: Settings, Impacts, and Mitigation Measures.

5.1 Growth-Inducing Impacts

This Program EIR must examine the potential growth-inducing impacts of the proposed General Plan. More specifically, CEQA Guidelines require that an EIR “discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly” (CEQA Guidelines Section 15126.2(d)). This analysis must also consider the removal of obstacles to population growth, such as improvements in the regional transportation system.

Growth-inducing impacts, such as those associated with job increases that might affect housing and retail demand in other jurisdictions over an extended time period, are difficult to assess with precision, since future economic and population trends may be influenced by unforeseeable events, such as natural disasters and business development cycles. Moreover, long-term changes in economic and population growth are often regional in scope; they are not influenced solely by changes or policies related to a single city or development project. Business trends are influenced by economic conditions throughout the state and country, as well as around the world.

Another consideration is that the creation of growth-inducing potential does not automatically lead to growth. Growth occurs through capital investment in new economic opportunities by the private or public sector. These investment patterns reflect, in turn, the desires of investors to mobilize and allocate their resources to development in particular localities and regions. These and other pressures serve to create policy. These factors, combined with the regulatory authority of local governments, mediate the growth-inducing potential or pressure created by a proposed plan. Despite these limitations on the analysis, it is still possible to qualitatively assess the general potential growth-inducing impacts of the proposed General Plan.

PROJECTED GROWTH

Population

Carlsbad will accommodate a population of approximately 131,152 people at buildout, an increase of about 21 percent over the 2013 population of 108,246. This represents an average annual growth rate of 0.9 percent.

Growth Management

In 1986, the City of Carlsbad adopted the Growth Management Plan, which requires adequate public facilities be provided concurrent with new growth in the city. To ensure this, the Growth Management Plan identifies performance standards for 11 public facilities. Compliance with the Growth Management Plan occurs through the Citywide Facilities and Improvements Plan, which identifies the performance standards for each of the 11 public facilities, divides the city into 25 local facility management zones, and identifies the city's ultimate public facility needs. A local facilities management plan identifies the public facility needs for each of the local facility management zones. Individual development projects must comply with the Citywide Facilities and Improvement Plan and the applicable local facilities management plan, which ensures that adequate public facilities are provided concurrent with development.

Also in 1986, Carlsbad voters approved Proposition E to limit the number of dwelling units in the city to a total of 54,599. It also placed limitations on the number of dwelling units that could be built in each of the city's four quadrants. Pursuant to Proposition E, the city cannot approve any General Plan amendment, zone change, subdivision map or other discretionary permit that could result in residential development that exceeds the dwelling unit limit in each quadrant. To increase the Proposition E dwelling unit limit in any city quadrant requires approval by Carlsbad voters. The changes in land use designations included in the proposed General Plan would allow for residential development that exceeds the Growth Management dwelling unit limitation in the northeast quadrant by 327 units. The excess in dwelling units above the cap is described in the proposed General Plan and, the proposed land use designation changes will be modified during the public hearing process to ensure compliance with the Growth Management Plan.

Public Facilities

Carlsbad is located in an area that is partially urbanized and is served by existing streets, utility infrastructure, and service systems. The Carlsbad Municipal Water District supplies about 82 percent of the city's water, while the Olivenhain Municipal Water District and the Vallecitos Water District serve the southeastern part of the city. The City of Carlsbad provides sewer collection services, and Carlsbad's wastewater is delivered to the Encina Wastewater Authority, where it is treated and recycled. Solid waste generated by the future residents and businesses is disposed of through a contract with Waste Management of North County, which has capacity for the increased population's solid waste. Future development under the proposed General Plan could generate additional demand for water and wastewater, storm water, and solid waste services; however, compliance with federal, state, and local regulations, as well as policies in the proposed General Plan would reduce the impacts of the proposed General Plan to less than significant levels. The water and wastewater districts providers within the city have prepared

urban water management plans, recycled water management plans, water master plans and sewer master plans to assess the current and future demands of their service area. Compliance with federal, state and local water and wastewater regulations and the proposed General Plan policies would reduce potential impacts to water and wastewater service needs and infrastructure needs to less than significant levels. Compliance with the city's current grading, drainage, and storm water regulations would ensure that the capacity of the storm water drainage systems would not be exceeded, and impacts would be less than significant. Potential impacts to solid waste would be reduced through compliance with SB X7-7, which has been set by CalRecycle to provide 75 percent recycling, composting, or source reduction of solid waste by 2020. Implementation of the proposed General Plan policies would assist the city in complying with this new waste reduction goal.

The Carlsbad Unified School District, and the city's Parks and Recreation, Police, and Fire departments provide schools, parks and recreation, police, and fire protection services to Carlsbad, respectively. At buildout of the proposed General Plan, Carlsbad's student population is expected to remain relatively stable or decline in three of the four school districts serving the city; therefore the capacity is expected to be sufficient for the buildout student population with no need for additional schools. Given existing facilities and planned parkland, and proposed General Plan policies that support the city's Growth Management Plan, a surplus of available parkland is anticipated to accommodate the buildout population in all quadrants without any resulting deterioration of existing parks. Development under the proposed General Plan would be in compliance with all applicable codes for fire safety and emergency access. Public safety services, including fire and police services, have stated needs for expansion in order to accommodate continued increases in population. Due to ongoing planning by the Police and Fire departments that reduces the need for construction activities to a minimum, the concentration of all new development in infill areas already adequately served by both departments, and policies that seek to address fire and safety needs of new residents, no growth-inducing impacts will result from the expansion of public safety service to meet buildout demand. Therefore, the proposed General Plan would not overtax the existing community services facilities, create an unfair burden on existing users, or require the construction of new public facilities that would cause significant environmental effects.

Increase in Regional Housing Demand

Carlsbad currently contains 44,440 dwelling units. The proposed General Plan estimates future buildout to be 52,320 dwelling units. As the employment base in Carlsbad continues to increase, more people may be drawn to live in the city. As a result, housing demand may increase in Carlsbad and other adjacent areas. San Diego Association of Governments (SANDAG) projects that Carlsbad will have approximately 50,100 housing units by 2035¹, based on land use designations in the current General Plan. In effect, SANDAG projects that demand for housing will taper off in the years past 2035, with the number of housing units reaching approximately 50,600 by 2050. Thus, the total housing capacity provided by the proposed General Plan should be sufficient to meet the city's long-term needs. The proposed General Plan Housing Element

¹ Interpolation of 2030 and 2040 projections.

addresses housing programs and how Carlsbad will accommodate its regional housing needs allocation. The proposed General Plan Housing Element includes programs to address regional housing needs in the near term, and subsequent revisions will extend, modify, or add to these programs as needed to continue to respond to the city's "fair share" of regional housing needs, as required by law.

Jobs/Employment Balance

A city's jobs/employment ratio (jobs to employed residents) would be 1:1 if the number of jobs in the city equaled the number of employed residents. In theory, such a balance would eliminate the need for commuting. More realistically, a balance means that in-commuting and out-commuting are matched, leading to efficient use of the transportation system, particularly during peak hours. The current jobs/employment ratio in Carlsbad is 1.3, which means more working adults travel in to the city to work than live in the city. Based on development projected under the proposed General Plan, this ratio is expected to be relatively constant increasing very slightly to 1.33, without accounting for aging population. Regional projections indicate that San Diego's population between ages 15 and 69 is expected to decline from 73 percent presently to 67 percent in 2035. If the same proportionate change in employed residents were to result then the jobs to employed residents ratio would increase to 1.43.

Indirect growth-inducing impacts such as those associated with job increases that might affect housing and retail demand in other jurisdictions over an extended time period are difficult to assess with precision. Moreover, long-term changes in economic and population growth are often regional in scope; they are not influenced solely by changes or policies in Carlsbad. It is possible that as some people retire, they may choose to relocate out of the jobs-rich (and generally more expensive) Carlsbad market to other less expensive areas, enabling those with jobs in Carlsbad to move to Carlsbad. The proposed General Plan also provides for additional housing beyond that projected by SANDAG, which would minimize housing impacts on surrounding communities as a result of jobs growth in Carlsbad. The proposed General Plan seeks to create a balanced community, with retail uses, parks, and other features to accommodate population growth, and thus will not induce growth or lead to growth pressure or pressure on services in surrounding communities.

5.2 Cumulative Impacts

CEQA requires that an EIR examine cumulative impacts. As discussed in CEQA Guidelines Section 15130(a)(1), a cumulative impact "consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." Furthermore, the analysis of cumulative impacts need not provide the level of detail required of the analysis of impacts from the project itself, but shall "reflect the severity of the impacts and their likelihood of occurrence" (CEQA Guidelines Section 15130(b)).

In order to assess cumulative impacts, an EIR must analyze either a list of past, present, and probable future projects or a summary of projections contained in an adopted general plan or related planning document. The proposed General Plan represents the cumulative development

scenario for the reasonably foreseeable future in Carlsbad. This future scenario incorporates the likely effects of surrounding regional growth.

CUMULATIVE ANALYSIS PROVIDED IN CHAPTER 3

Several analyses presented in Chapter 3: Settings, Impacts, and Mitigation Measures represent cumulative analyses of issues over the proposed General Plan time horizon to 2035 because they combine the anticipated effects of the proposed General Plan with anticipated effects of regional growth and development. By their nature, the air quality; transportation; noise; and energy, greenhouse gas (GHG) emissions, and climate change analyses presented in Chapter 3 represent a cumulative analysis, because the effects specific to the proposed General Plan cannot reasonably be differentiated from the broader effects of regional growth and development. Thus, analyses for these topics reflect not just growth in Carlsbad, but growth elsewhere in the region as well. The cumulative conclusions are summarized there, and where applicable, significant unavoidable impacts listed in Section 5.3.

Other cumulative impacts are identified below and within the relevant sections of Chapter 3.

OTHER CUMULATIVE IMPACTS

For some issue areas evaluated as direct impacts in Chapter 3, concurrent implementation of the proposed General Plan, along with regional growth and development, may result in cumulative impacts. However, the project's contribution is not cumulatively considerable. These include:

- ***Cumulative Changes to Land Use Character.*** Land use changes that would alter the scale, density, and character of urban areas and neighborhoods could change the visual character of areas in the region. However, the proposed General Plan seeks to ensure that Carlsbad's small-town "feel" will be maintained through the scale of development, and promotes planning practices that foster greater connections between neighborhoods and uses. Appropriately scaled development will ensure that mature trees and expansive open spaces dominate much of the city's landscape, with clustered opportunities for urban-scaled development. Due to the goals and policies to protect open spaces, parks, and agricultural lands in Carlsbad and the attention to preserving existing neighborhoods through policies and land use design, the proposed General Plan's contribution to this potentially significant cumulative impact is not cumulatively considerable.
- ***Cumulative Effects on Water Quality.*** The proposed General Plan, in combination with regional growth and development, could increase impervious surfaces resulting in a greater chance of flood and potential impacts to water quality. However, due to the near built-out nature of Carlsbad, and the extensive proposed General Plan policies designed to improve stormwater management and reduce stormwater pollution, the proposed General Plan's contribution to this potentially significant cumulative impact is not cumulatively considerable.
- ***Cumulative Effects on Biological Resources.*** Increased noise, light, and habitat disturbance resulting from urban development both within Carlsbad as well as in adjacent cities and unincorporated areas could adversely affect biological resources such

as migratory birds and other wildlife species. However, with applicable policies in place as described in the direct impact analysis in Chapter 3, the project's contribution to this potentially significant cumulative impact is not cumulatively considerable.

- ***Cumulative Increases in Hazardous Materials.*** The increase in local population and employment could result in the increased use of hazardous household, commercial, and industrial materials, as well as a cumulative increase in exposure to risk associated with accidental release of hazardous materials into the environment. However, city, state, and federal regulations, such as those that control the production, use, and transportation of hazardous materials, would apply to development countywide; therefore, the project's contribution to this potentially significant cumulative impact is not cumulatively considerable.
- ***Cumulative Effects on Historical Resources.*** The accommodation of future growth also constitutes a very low likelihood that future development will encounter challenges associated with known and unknown historic resources. However, there is the possibility of cumulative impacts to historical resources in the future in the context of regional growth and development. The City of Carlsbad cannot be sure that all cumulative impacts on such historical resources can be mitigated to less than significant levels. Consequently, the proposed General Plan may have the potential to contribute to cumulative impacts to these historic resources. However, with implementation of proposed General Plan policies and state and federal law, the proposed General Plan's contribution to this potentially significant cumulative impact is not cumulatively considerable.

These types of impacts are not limited to Carlsbad but are characteristic of any area that is experiencing population and employment growth.

5.3 Significant and Unavoidable Impacts

Significant unavoidable impacts are those that cannot be mitigated to a level that is less than significant. According to CEQA Guidelines 15126(b), an EIR must discuss any significant environmental impacts that cannot be avoided under full implementation of the proposed program. Chapter 3 identified the following significant unavoidable impacts when comparing the proposed General Plan to existing conditions:

AIR QUALITY

Implementation of the proposed General Plan would facilitate development within Carlsbad that would allow additional residential units and commercial/office/industrial space by 2035 buildout over existing conditions. The proposed General Plan may conflict with the San Diego County Regional Air Quality Strategy (RAQS) because it will allow development in excess of the growth projections on which the RAQS is based. Although this conflict may be eliminated by updating the growth projections in the next triennial update of the RAQS, it is considered a significant and unavoidable impact because updating the RAQS is within the jurisdiction and control of the SDAPCD and SANDAG, and the city cannot assure the timing and implementation of the proposed mitigation.

Criteria pollutant emissions would occur during construction and operational activities. Future construction allowed under the proposed General Plan would result in a temporary addition of pollutants to the local airshed caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, prevailing weather conditions. Therefore, such emission levels can only be approximately estimated with a corresponding uncertainty in precise ambient air quality impacts. Fugitive dust (PM₁₀ and PM_{2.5}) emissions would primarily result from grading and site preparation activities. NO_x and CO emissions would primarily result from the use of construction equipment and motor vehicles.

Although specific project construction schedules that would be implemented under the proposed General Plan are not known at this time, construction emissions generated during construction of future development would potentially exceed San Diego Air Pollution Control District (SDAPCD) thresholds; therefore, impacts would be considered potentially significant. Compliance with SDACPD rules, and proposed General Plan policies listed in Section 3.2, would further aid in reducing emissions associated with construction activities; for example, compliance with the city's storm water pollution prevention plan (SWPPP) requirements, which include implementation of best management practices (BMPs) such as dust control measures and other construction-related measures during grading and construction activities would reduce emissions. However, there is no guarantee emissions would be reduced below SDAPCD thresholds. Therefore, impacts would remain significant and unavoidable during construction.

Operational emissions from motor vehicles, due to vehicular traffic generated by future development, and area sources, such as natural gas combustion, landscaping, and architectural coatings for maintenance, would exceed the SDAPCD's significance threshold for VOC, NO_x, CO, PM₁₀, and PM_{2.5} primarily due to motor vehicle emissions; therefore, impacts would be potentially significant. Measures outlined in the city's SWPPP and Green Building Standards Code would reduce impacts associated with operational emissions; however, there is no guarantee emissions would be mitigated below SDAPCD thresholds. Due to the substantial increase anticipated in average daily traffic (ADT) as a result of development under the proposed General Plan, no mitigation is available to reduce CO and PM₁₀ impacts from motor vehicles to a level that is less than significant. A number of proposed General Plan policies (listed in Section 3.2) as well as measures outlined in the city's SWPPP and Green Building Standards Code would reduce impacts associated with long-term operational criteria pollutant emissions; however, impacts would remain significant and unavoidable during operation.

As identified in Section 3.2, development allowed under the proposed General Plan would result in a cumulatively considerable net increase of criteria pollutants for which the General Plan region is nonattainment under an applicable federal or state ambient air quality standard. Although the goals and policies of the proposed General Plan and other recommended measures (listed in Section 3.2) would reduce the net increase in emissions for which the SDAB is in nonattainment status, it is not possible at this time to state with certainty that these measures would result in no net increase in nonattainment pollutant emissions. Therefore, impacts would be considered significant and unavoidable.

The proposed General Plan may result in the exposure of sensitive receptors to substantial pollutant concentrations associated with new development constructed in proximity to SR-78 and I-5. Although implementation of the goals and policies of the proposed General Plan and other recommended measures (listed in Section 3.2) would reduce the exposure of sensitive receptors to substantial pollutant concentrations, impacts would be considered significant and unavoidable because it is not possible at this time to state with certainty that these measures would reduce exposure to substantial pollutant concentrations to a level below significance.

TRANSPORTATION

Implementation of the proposed General Plan, in conjunction with anticipated regional growth and development, would cause a degradation of the automobile level of service (LOS), taking into account all modes of transportation, including mass transit and non-motorized travel. At buildout of the proposed General Plan, vehicle LOS is anticipated to operate at LOS D or better, with the exception of the following streets, which are anticipated to operate below LOS D:

- Two segments of Palomar Airport Road,
- One segment of La Costa Avenue,
- One segment of El Camino Real
- Interstate-5 through Carlsbad
- State Route 78 near the city

These facilities listed above would generally be congested during peak periods; however, during most hours of the day, the facility would have sufficient capacity to serve the vehicle demand. The city does not have regulatory authority over Interstate-5 or SR-78 and has no control over managing traffic on those facilities. The Carlsbad arterial streets listed above would need to be widened beyond their four- or six-lane cross-sections to operate at the city's standard for vehicle level of service on those facilities (LOS D or better); however, creating streets wider than six lanes is inconsistent with the goals of the proposed General Plan. In addition, widening these streets beyond six lanes creates new challenges for intersection operations, maintenance, and storm water management. Therefore, rather than widening these arterial streets, the proposed General Plan promotes implementation of transportation demand management (e.g. promote travel by modes other than the single-occupant vehicle), transportation system management (e.g. signal timing coordination and improved transit service) and livable streets techniques to better manage the transportation system as a whole. This impact is considered significant and unavoidable.

5.4 Significant Irreversible Environmental Change

CEQA Guidelines require an EIR to consider whether “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely” (CEQA Guidelines Section 15126.2(c)). “Nonrenewable resource” refers to the physical features of the natural environment, such as land or waterways. Irretrievable commitments of non-renewable resources associated with the proposed General Plan include:

WATER CONSUMPTION

New development under the proposed General Plan will increase the demand for water supplies for residential, commercial and industrial uses. It would place a greater demand on Carlsbad Municipal Water District, Olivehain Municipal Water District, and Vallecitos Water District, which derive water supply from Northern California watersheds and the Colorado River, in addition to recycled water supplies. This increased demand for public water represents an irreversible environmental change.

ENERGY SOURCES

New development under the proposed General Plan would result in increased energy use, in the form of new buildings and transportation. Both residential and nonresidential development use electricity, natural gas, and petroleum products for power, lighting, heating, and other indoor and outdoor services, while cars use both oil and gas. Use of these types of energy for new development would result in the overall increased use of nonrenewable energy resources. This represents an irreversible environmental change.

CONSTRUCTION-RELATED IMPACTS

Irreversible environmental changes could also occur during the course of constructing development projects made possible by the proposed General Plan. New construction would result in the consumption of building materials, such as lumber, sand and gravel for construction. Resources that supply building materials are already being depleted locally and worldwide.

5.5 Impacts Found Not to Be Significant

CEQA requires that an EIR provide a brief statement indicating why various possible significant impacts were determined to be not significant. Chapter 3 of this Program EIR discusses all potential impacts, regardless of their magnitude. A similar level of analysis is provided for impacts found to be less than significant as impacts found to be significant. Significance of an impact is assessed in relation to the significance criteria provided in each section in Chapter 3. A summary of all impacts is provided in the Executive Summary of this Program EIR.

Recirculated Portions of the Draft Program
Environmental Impact Report for the Carlsbad General Plan Update
Chapter 5: CEQA Required Conclusions

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